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The Honorable Marsha J. Pechman

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STIPULATED MOTION FOR EXTENSION OF TIME TO SEND NOTICES – Page 1

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

JENNIFER BRITT, Individually and for Others Similarly Situated,

Plaintiff,

VS.

CLALLAM COUNTY PUBLIC HOSPITAL DISTRICT NO. 2 d/b/a OLYMPIC MEDICAL CENTER, a Washington Municipal Corporation,

Defendant.

Case No: 3:23-cv-05377-MJP

STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO SEND SETTLEMENT NOTICES

NOTED FOR HEARING: 9/27/2024

The Court previously granted preliminary approval of a class action settlement, wherein the Court ordered the settlement administrator to mail and email the settlement notice packets to the Class Members no later than 14 days after receipt of class data from Defendant Clallam County Public Hospital District No. 2 d/b/a Olympic Medical Center ("Defendant"). *See* Dkt. # 38 at 16. That deadline is scheduled to fall on September 27, 2024.

Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff and Class Representative Jennifer Britt ("Plaintiff") and Defendant jointly move for an extension of time to mail and email the settlement notice packets by two (2) weeks, until October 11, 2024.

The parties seek this extension of time to resolve differences related to the class list. The parties agree additional time is needed to resolve these differences before the notice packets are sent out.

This is the first request for an extension of time related to this deadline. The other deadlines that would be affected by this extension would be those deadlines stemming from the

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1 date notice is issued (see Dkt. # 38 at 16-17), which include the deadline for Class Members to 2 postmark requests to exclude themselves, or "opt-out," or to file objections to the settlement (60 3 days from issuance of notice), the deadline for Class Members to submit signed opt-in consent 4 forms (60 days), and the deadline for the settlement administrator to provide a report (10 days 5 after close of notice period). Id. 6 7 Respectfully and jointly submitted on September 27, 2024 by: 8 /s/ William M. Hogg /s/ Kyle D. Nelson (w/ permission) Michael A. Josephson (*Pro Hac Vice*) Charles N. Eberhardt 9 Andrew W. Dunlap (Pro Hac Vice) Kyle D. Nelson Margo S. Jasukaitis PERKINS COIE LLP William M. Hogg (*Pro Hac Vice*) 10 JOSEPHSON DUNLAP LLP 11 Greenway Plaza, Suite 3050 1201 Third Avenue, Suite 4900 11 Houston, Texas 77046 Seattle, Washington 98101 Tel: (206) 359-8000 Tel: (713) 352-1100 12 Fax: (206) 359-9000 mjosephson@mybackwages.com adunlap@mybackwages.com ceberhardt@perkinscoie.com 13 whogg@mybackwages.com kylenelson@perkinscoie.com mjasukaitis@perkinscoie.com 14 Michael C. Subit, WSBA # 29189 FRANK FREED SUBIT & THOMAS LLP Counsel for Defendant 15 705 Second Avenue, Suite 1200 Seattle, Washington 98104 16 Tel: (206) 682-6411 msubit@frankfreed.com 17 Richard J. (Rex) Burch 18 **BRUCKNER BURCH PLLC** 11 Greenway Plaza, Suite 3025 19 Houston, Texas 77046 Tel: (713) 877-8788 20 rburch@brucknerburch.com 21 William C. (Clif) Alexander (Pro Hac Vice) Austin W. Anderson (Pro Hac Vice) 22 Carter T. Hastings (*Pro Hac Vice*) ANDERSON ALEXANDER PLLC 23 101 N. Shoreline Blvd., Ste. 610 Corpus Christi, Texas 78401 24 Tel: (361) 452-1279 clif@a2xlaw.com 25 austin@a2xlaw.com carter@a2xlaw.com 26

STIPULATED MOTION FOR EXTENSION OF TIME TO SEND NOTICES – Page 2

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FRANK FREED SUBIT & THOMAS LLP 705 Second Avenue, Suite 1200 Seattle, WA 98104 Tel: (206) 682-6711 JOSEPHSON DUNLAP LLP 11 Greenway Plaza, Ste. 3050 Houston, TX 77046 Tel: (713) 352-1100 Case 3:23-cv-05377-MJP Document 44 Filed 11/04/24 Page 3 of 3

Attorneys for Plaintiff, Class, and Collective Members

shall be extended until November 11, 2024.

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5 | [PROPOSED] ORDER

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The deadline for ILYM Group to mail and email the Notice Packets to Class Members

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11 Dated November 4, 2024.

IT IS SO ORDERED.

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28 STIPULATED MOTION FOR EXTENSION OF TIME TO SEND NOTICES – Page 3

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Maisley Pielens.
The Honorable Marsha J. Pechman

United States District Judge